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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TROY MELNEK,

Petitioner,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, JOSEPH LOMBARDO,
CODY PHINNEY in her individual
capacity, JO MALAY, in her individual
capacity, STEIN HOSPITAL, and DOES I
– V, and ROE CORPORATIONS I – V,
inclusive,

Respondents.

Case No. 2:23-CV-01303-GMN-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME (FIRST
REQUEST)**

Respondents, MURI-STEIN HOSPITAL, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, hereby respectfully moves this Court for an order granting a fourteen (14) day enlargement of time, up to and including July 8, 2025, in which to file and serve their Reply to Plaintiff's Response to Motion to Dismiss (ECF 106).

This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and other materials on file herein.

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1 There have been no prior enlargements of Respondent's time to file said response, and this motion
2 is made in good faith and not for the purposes of delay.

3 RESPECTFULLY SUBMITTED this 24th day of June 2025.

4 AARON D. FORD
5 Attorney General

6 By: /s/ Diana Collins
7 DIANA COLLINS (Bar. No. 16828)
8 Deputy Attorney General
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DECLARATION OF COUNSEL

I, DIANA COLLINS, declare under penalty of perjury:

1. I am an attorney employed by the Office of the Attorney General of the State of Nevada, and I make this declaration on behalf of Respondent, MURI-STEIN’S Motion for Enlargement of Time in the above-captioned matter.

2. By this motion, I am requesting an enlargement of time to file Respondent’s Reply to Plaintiff’s Response to Motion to Dismiss. The Reply is currently due Tuesday June 24, 2025. Respondent requests an enlargement of fourteen (14) days up to, and including, Tuesday, July 8, 2025, to file the Reply. This is Respondent’s first request for an extension of this deadline.

3. Since Melnek filed his Response and his Motion for Additional Discovery, I have remained busy reviewing these filings, in addition to working on numerous other matters. Unfortunately, on Saturday, June 21, 2025, at approximately 4:00 p.m. I was involved in a vehicle collision. Another vehicle rear-ended my vehicle while I was at a stop light. Due to injuries sustained in the car accident, I require both immediate and ongoing medical treatment and will be unable to fulfill my responsibilities in the immediate future, including finalizing the Reply intended to aid the Court in resolving Muri-Stein’s Motion to Dismiss. For that reason, Respondent respectfully requests this Court issue an order granting Respondent, Muri-Stein Hospital an extension of fourteen (14) days, up to and including July 8, 2025, to file their Reply to Plaintiff’s Response.

4. I contacted opposing counsel, David F. Sampson, Esq. about this request. He indicated that he does not oppose the request for an extension of time.

5. This Motion for Enlargement of Time is made in good faith and not for the purpose of unduly delaying the ultimate disposition of this case

I declare under penalty of perjury that the foregoing is true and correct.

By: /s/ Diana Collins
DIANA COLLINS (Bar. No. 16828)
Deputy Attorney General

ORDER

IT IS HEREBY ORDERED, *nunc pro tunc*, that Respondent's request for enlargement of time is GRANTED. The responsive filing shall be due on July 8, 2025.

Dated this 24 day of June, 2025.



DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General and that on this 24th day of June, 2025, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME (FIRST REQUEST)**, by U.S. District Court CM/ECF electronic filing to:

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/s/ Lanette Davis
An Employee of the Office of the Attorney General